

PUBLIC UTILITIES COMMISSION

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December 12, 2018

Advice Letter 4038-G

Erik Jacobson
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**SUBJECT: Annual Gas True-Up of Gas Transportation Balancing Accounts for Rates
Effective January 1, 2019**

Dear Mr. Jacobson:

Advice Letter 4038-G is effective as of January 1, 2019. All balances in the accounts authorized for recovery are subject to audit, verification and adjustment.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division

Erik Jacobson
Director
Regulatory Relations

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November 1, 2018

Advice 4038-G

(Pacific Gas and Electric Company ID U 39G)

Public Utilities Commission of the State of California

**Subject Annual Gas True-Up of Gas Transportation Balancing Accounts for
Rates Effective January 1, 2019**

Purpose

Pacific Gas and Electric Company (PG&E) submits this Annual Gas True-Up (AGT) of gas transportation balancing accounts to amortize account balances in core and noncore gas transportation rates effective January 1, 2019. This advice letter also provides a *preliminary* estimate of projected gas transportation and Public Purpose Program (PPP) Surcharge revenues authorized by, or currently pending before and expected to be authorized by, the California Public Utilities Commission (Commission or CPUC) for rates effective January 1, 2019.

Consistent with prior years, this AGT advice letter does not include 2019 gas procurement-related revenue requirement changes, which will be submitted in PG&E's monthly core procurement advice letter in late December 2018.

PG&E requests approval of this Tier 2 advice letter within 30 days (by December 1, 2018) with an effective date of January 1, 2019. PG&E will submit a separate Tier 1 advice letter in late December consolidating all final authorized revenue requirements and updated forecast end-of-year gas transportation balancing accounts for rates effective January 1, 2019.

Overview of Preliminary AGT

PG&E's preliminary estimate of its 2019 gas transportation revenue requirements is \$3,745 million, which is a \$159 million increase compared to present rates. Table 1 summarizes the major components of PG&E's 2019 gas transportation revenue requirements.

Table 1 Proposed Gas Transportation Revenue Requirements Effective January 1, 2019 (\$ millions)¹			
Description	Currently in Rates	Proposed	Change
End-Use Gas Transportation	\$3,107	\$3,252	\$145
Storage and Backbone Unbundled Costs	231	231	0
Gas PPP Surcharges ²	248	262	14
Total Gas Transportation Revenue Requirements	\$3,586	\$3,745	\$159

Attachment 1 summarizes the proposed 2019 gas transportation revenue requirements. Attachment 2 summarizes the forecast December 31, 2018 balances for gas transportation balancing accounts using recorded balances through September 30, 2018. The total December 31, 2018 gas transportation balancing account balances are projected to be undercollected by \$340 million, as shown in Attachment 1, line 1, and Attachment 2, line 22. This represents a \$61 million decrease in the gas transportation balancing account undercollections from those currently amortized in gas transportation rates. Finally, Attachments 3 through 5 provide illustrative rates and surcharges resulting from the amounts summarized in Attachments 1 and 2.

Background

The AGT is an annual process to change core and noncore gas transportation rates, as established in PG&E's 2005 Biennial Cost Allocation Proceeding (BCAP) Decision (D.) 05-06-029.³ That decision requires PG&E to submit an advice submittal to change core and noncore transportation rates 45 days prior to the end of each calendar year for rates effective January 1.

As described in PG&E's Preliminary Statement C-Gas *Accounting Terms and Definitions*, Part 12.b, *Revision Dates*, the AGT updates the customer class charge components of transportation rates to recover all gas transportation-related balancing and memorandum account balances for costs that the Commission has authorized to be recovered in rates. PG&E determines the change in the customer class charge components of transportation rates as follows:

¹ This table does not include 2019 gas procurement-related revenue requirement changes, which will be submitted in PG&E's monthly core procurement advice letter in late December 2018.

² Submitted for Commission approval in Advice 4037-G, which was submitted on October 31, 2018.

³ D. 05-06-029, p. 10 and Finding of Fact 9.

- 1) Forecasting the December 31, 2018 balance for each gas transportation balancing and memorandum account to be updated in the AGT based on the September 30, 2018 recorded balances plus a forecast of costs and revenues, including interest, through December 31, 2018; and
- 2) Calculating the customer class charge components by dividing the forecasted December 31, 2018 balancing account balance by PG&E's currently adopted BCAP throughput forecast (D. 10-06-035). Note that on September 14, 2017, PG&E filed its 2018 Gas Cost Allocation Proceeding Application (A.) 17-09-006, requesting to update its throughput forecast among other things. That application is still pending before the Commission and not currently reflected in this AGT.

Transportation Balancing Accounts Already Approved for Amortization in the 2019 AGT

This section describes: (1) the balancing accounts that will be amortized through this AGT advice letter; (2) the recent CPUC decisions impacting the balancing account balances; and (3) PG&E's proposals to recover the forecasted balances in rates, effective January 1, 2019.

Certain account balances are recovered in rates through the Core Fixed Cost Account (CFCA) and/or Noncore Customer Class Charge Account (NCA) rate components, as described below. For these accounts, PG&E will transfer the recorded December 31, 2018 balances to the appropriate subaccount of the CFCA and/or NCA, once the AGT is approved.

Core Fixed Cost Account – (Attachment 2, Lines 1-2)

The CFCA records authorized General Rate Case Phase I (GRC) gas distribution base revenue amounts (with credits and adjustments), certain other core transportation costs, and transportation revenue from core customers. The CFCA has three subaccounts:

- (i) Distribution Cost subaccount recovers the core distribution base revenue requirements adopted in PG&E's GRC, including annual attrition adjustments, adjustments resulting from cost of capital proceedings, and other core distribution-related costs authorized by the Commission. The Distribution Cost subaccount is allocated to core customer classes in proportion to their adopted allocation of distribution base revenues;
- (ii) Core Cost subaccount recovers non-distribution-related costs, such as the Self-Generation Incentive Program (SGIP) and the local transmission revenue requirements adopted by the Commission. The Core Cost subaccount is allocated to core transportation customers on an equal-cents-per-therm basis; and

- (iii) Assembly Bill (AB) 32 Cost of Implementation Fee Core subaccount recovers the gas portion of California Air Resources Board's (ARB) AB 32 Cost of Implementation Fee, allocated to PG&E's applicable core transportation customers on an equal-cents-per-therm basis, as further described below.

The AGT includes a forecasted \$219.7 million net undercollection in the CFCA, excluding the AB 32 Cost of Implementation Fee Core subaccount, which is described separately below. The net undercollection in the CFCA results from:

- (i) A forecasted \$213.2 million undercollection in the Distribution Cost subaccount; and
- (ii) A forecasted \$6.5 million undercollection in the Core Cost subaccount.

Noncore Customer Class Charge Account - (Attachment 2, Lines 3-4)

The NCA records noncore costs and revenues from noncore customers for programs such as SGIP which receive balancing account treatment. The NCA has three subaccounts:

- (i) The Noncore subaccount recovers costs and balances from all noncore customers for non-distribution cost-related items and is allocated on an equal-cents-per-therm basis;
- (ii) The Distribution subaccount recovers the noncore distribution portion of gas revenue requirements adopted in GRC decisions and other noncore distribution-related costs and balances approved by the Commission. It is allocated to noncore classes in proportion to their adopted allocation of distribution base revenues; and
- (iii) The AB 32 Cost of Implementation Fee Noncore subaccount, which recovers the gas cost portion of the AB 32 cost of implementation fee, allocated to PG&E's applicable noncore transportation customers, as further described below.

The AGT includes a forecasted \$12.3 million net overcollection in the NCA, excluding the AB 32 Cost of Implementation Fee Noncore subaccount, which is described separately below. The net undercollection in the NCA results from:

- (i) A forecasted \$7.1 million overcollection in the Noncore subaccount; and
- (ii) A forecasted \$5.2 million overcollection in the Distribution subaccount.

AB 32 Cost of Implementation Fee – (Attachment 2, Line 13)

As described above, the AB 32 Cost of Implementation (COI) Fee is recovered in two subaccounts: (1) the core subaccount of the CFCA recovers the gas cost portion of the AB 32 COI Fee allocated to core customers; and (2) the noncore subaccount of the NCA recovers the gas cost portion of the AB 32 COI Fee allocated to noncore customers. In accordance with D. 12-10-044 and Advice 3348-G, the AB 32 COI Fee is allocated to all non-exempt customers on an equal-cents-per-therm basis. As indicated in Advice 3348-G, the ARB provides PG&E with an invoice and a list of PG&E customers who pay the COI fee directly to the ARB. Customers paying the COI Fee directly to the ARB are exempt from paying for COI Fee costs through PG&E's rates. PG&E has updated the currently adopted volumes used to calculate PG&E's 2019 COI rates to reflect a reduction of the volumes associated with exempt customers. The AGT balance proposed to be amortized in 2019 rates consists of a forecasted \$6.2 million net undercollection in the AB 32 Cost of Implementation Fee subaccounts.

Core Brokerage Fee Balancing Account (CBFBA) - (Attachment 2, Line 5)

The CBFBA ensures that variations between the adopted forecast brokerage fee revenue requirement credits in core transportation rates and actual brokerage fee revenues collected from core procurement customers will flow through core transportation rates. This account was adopted in PG&E's 2005 BCAP decision (D. 05-06-029). The AGT includes a forecasted \$992 thousand undercollection in the CBFBA. The CBFBA balance is included in the rate component of the Core Cost subaccount of the CFCA.

Hazardous Substance Mechanism (HSM) - (Attachment 2, Line 6)

The HSM provides a uniform methodology for allocating costs and related recoveries associated with covered hazardous substance-related activities, including hazardous substance clean-up and litigation, and related insurance recoveries, as set forth in D. 94-05-020 (the original HSM decision) through the Hazardous Substance Cost Recovery Account (HSCRA). The Commission has approved an allocation of Hazardous Substance Mechanism costs on an equal-cents-per-therm basis⁴. This AGT forecasts a \$91.5 million balance for collection in the HSCRA. Once allocated, the HSCRA balance is included in the rate component of the Core Cost subaccount of the CFCA and the Noncore subaccount of the NCA.

Balancing Charge Account (BCA) - (Attachment 2, Line 7)

The BCA records the revenue and costs associated with providing gas balancing service, including charges and credits, as described in gas Schedule G-BAL and Gas Rule 14. PG&E currently forecasts a \$261 thousand overcollection in the BCA.

⁴ See also gas Preliminary Statement Part AN.

The BCA balance is included in the rate component of the Core Cost subaccount of the CFCA and the Noncore subaccount of the NCA.

Customer Energy Efficiency Incentive Account (CEEIA) - (Attachment 2, Line 9)

The CEEIA records the gas portion of any Efficiency Savings Performance Incentive (ESPI) award authorized by the Commission to be recovered in rates. Interest does not accrue in this subaccount pursuant to D. 07-09-043. This AGT includes a forecasted \$3.9 million undercollected balance, which will be recovered through the CEE Incentive rate component. As discussed in more detail below in the "Recent, Pending and Anticipated CPUC Proceedings and Advice Letters" section, PG&E will update the December AGT forecast based on the Commission's Final Savings Performance Statement. The CEEIA is recovered from core and noncore customers in proportion to their adopted allocation of distribution base revenues.

California Solar Initiative Thermal Program Memorandum Account (CSITPMA) - (Attachment 2, Line 10)

Advice 3093-G established the CSITPMA to record expenses incurred by PG&E for implementing the CSI Thermal Program authorized by D. 10-01-022. Customers who participate in the California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) Programs, customers who are currently exempt from funding the SGIP, and customers exempt pursuant to Public Utilities Code Section 2863(b)(4) are exempt from CSI Thermal Program charges. This AGT includes a forecasted \$6.9 million undercollected balance in the CSITPMA, and will be recovered in the CSITPMA rate component, allocated on an equal-cents-per-therm basis (with exceptions noted above).

Adjustment Mechanism for Costs Determined in Other Proceedings (AMCDOP) – (Attachment 2, Line 11)

The AMCDOP was approved by the Commission in D.11-04-031 (approving the Gas Accord V Settlement, and continued in PG&E's 2015 Gas Transmission and Storage (GT&S) rate case, D.16-06-056). The purpose of the AMCDOP is to record the difference in the revenue requirement associated with costs determined in other proceedings and the revenue requirements based on placeholder costs included in PG&E's GT&S filings. Examples of "other proceedings" are PG&E's GRC, the cost of capital proceedings, and the Pension Recovery Proceeding. The AMCDOP is governed by Gas Preliminary Statement Part CO, which specifies that the AMCDOP shall apply to all customer classes. According to the Preliminary Statement, 50% of the total costs are allocated to core customers and 50% to noncore customers through the customer class charge.

The 2017 GRC revenue requirements adopted in D. 17-05-013 include adopted administrative and general (A&G) costs, payroll taxes, common costs, revenue fees and uncollectibles (RF&U) that are different from those used as placeholders in calculating the 2018 GT&S revenue requirements in the 2015 GT&S rate case

decision. In addition, the 2017 GRC decision also adopted different common cost allocation percentages for the year 2018 compared to those percentages used in the 2015 GT&S decision. As a result, the 2018 GT&S revenue requirements determined in the 2015 GT&S decision were revised to account for the cost and cost allocation differences and recorded in the AMCDOP for recovery in 2019. In addition, PG&E has reflected the 2018 cost of capital credit of \$15.1 million. This AGT includes a forecast \$38.2 million undercollected balance in the AMCDOP.

Non-Tariffed Products and Services Balancing Account (NTBA-G) - (Attachment 2, Line 12)

The NTBA-G is used to record the core customer share of revenues net of costs and income taxes associated with new Non-Tariffed Products and Services (NTP&S), pursuant to CPUC Affiliate Transaction Rule VII. Costs and revenues are tracked for appropriate disbursement of revenues, net of expense, to customers and shareholders via the 50/50 sharing mechanism as approved by D. 99-04-021. The NTBA-G does not apply to NTP&S in PG&E's existing NTP&S catalogue, which remains subject to other operating revenue treatment, consistent with D. 99-04-021. In Resolution G-3417, the Commission approved PG&E's proposal to offer the Mover Services Program; to recover costs and disburse net revenues through the NTBA-G; to transfer the balance at the end of the year from the NTBA-G to the CFCA; and to include it in the AGT submittal, in order to credit customer revenues pursuant to D. 99-04-021. If the balance at the end of the year for any product or service category is undercollected, no transfer will be made for that product or service category, and the balance for that product or service category will be reset to zero at the beginning of the year. PG&E forecasts a \$220 thousand overcollected balance for this account, which will be transferred to the Distribution Cost subaccount of the CFCA.

Gas Pipeline Expense Reimbursement Balancing Account (GPERBA) - (Attachment 2, Line 14)

The GPERBA records PG&E's reimbursements to the Commission associated with implementing and complying with D. 12-12-030, up to \$15 million. PG&E forecasts a balance of \$299 thousand undercollection in this account. The balance in this account is recovered through the Core Cost subaccount of the CFCA and Noncore subaccount of the NCA at 59.5% and 40.5%, respectively.

Pension Contribution Balancing Account (PCBA) - (Attachment 2, Line 17)

The PCBA includes the revenue requirement associated with the difference, if any, between adopted pension contributions and (i) lower contributions for any reason or (ii) federally mandated higher contributions, with the difference to be refunded to or recovered from customers. PG&E's contribution to the pension plan have matched the amounts adopted in D. 06-06-014 and D. 07-03-044. As a result, PG&E does not expect that the PCBA will have a balance on December 31, 2018. Should it

have a balance, it would be recovered through the Distribution Subaccounts of the CFCA and NCA.

Gas Transmission & Storage Revenue Sharing Mechanism (GTSRSM) – (Attachment 2, Line 18)

Originally adopted as part of the Gas Accord V Settlement Agreement, the GTSRSM records the difference between adopted noncore and unbundled revenue requirements and recorded noncore and unbundled revenues to be shared between customers and shareholders, as further described below. The GTSRSM consists of the following four subaccounts:

- (i) The Backbone subaccount, which records the difference between the adopted unbundled backbone revenue requirement and the portion of backbone revenues allocated to core customers that are collected volumetrically and recorded backbone revenues, whether an over-collection or an under-collection, to be shared 50% to customers and 50% to shareholders.
- (ii) The Local Transmission subaccount, which records the difference between the adopted noncore local transmission revenue requirement and recorded local transmission revenues, whether an over-collection or an under-collection, to be shared 75% to customers and 25% to shareholders.
- (iii) The Storage subaccount, which records the difference between the adopted unbundled storage revenue requirement and recorded unbundled storage revenues, if an over-collection, to be shared 75% to customers and 25% to shareholders. PG&E is at risk for 100% of any net under-collections.
- (iv) The Revenue Sharing subaccount, which records the difference between the customer portion of recorded total over- or under-collections, as determined in the above three subaccounts.

In accordance with Preliminary Statement Part CP, the balances in the first three subaccounts⁵ are transferred to the Revenue Sharing subaccount as of September 30 of each year; and the Revenue Sharing subaccount is transferred in a 50-50 segmentation to the Core Cost subaccount of the CFCA and the Noncore subaccount of the NCA upon approval of the December AGT advice letter. This advice letter includes an \$8.9 million overcollected balance in the GTSRSM.

Mobile Home Park Balancing Account – Gas (MHPBA) – (Attachment 2, Line 19)

The MHPBA records and recovers actual incurred costs of implementing the voluntary program to convert the gas master-meter/submeter service at mobile home parks and manufactured housing communities to direct service by PG&E, pursuant to D.14-03-021. Advice 3473-G provided that the disposition of the balance in the account shall be through the AGT, via the CFCA and NCA, or other venues as approved by the Commission. This AGT includes a forecast \$14.4 million undercollected balance in the MHPBA. The balance is recovered through the Distribution Subaccounts of the CFCA and NCA.

Discussion of Recent, Pending and Anticipated CPUC Proceedings and Advice Letters

The following section highlights recent and pending decisions and advice letter submittals that may impact PG&E's gas transportation revenue requirements and rates submitted in the AGT:

Recent Decisions**Ex Parte Penalty (Attachment 2, line 8)**

On May 3, 2018, the Commission issued a Final Revised Decision in its Ex Parte Order Instituting Investigation (I.15-11-015) which adopted a modified settlement and resulted in both non-financial and financial remedies. Under the terms of the Settlement, PG&E was ordered to forgo collection of \$63.5 million in revenue requirements for the years 2018 (\$31.75 million) and 2019 (\$31.75 million) as determined in its 2015 GT&S rate case and implemented through the AGT advice submittal. As the Commission's Final Decision (D.18-04-014) was issued subsequent to PG&E's 2018 AGT advice letter, PG&E will forgo collection of the \$63.5 million for 2018 and 2019 for rates effective January 1, 2019. The credit will be given back through the Core Cost Subaccount of the CFCA and the Noncore Subaccount of the NCA with an allocation based on the 2018 GT&S revenue responsibility by function (i.e., backbone, local transmission and storage).

⁵ If the storage subaccount is undercollected as of September 30, the balance will be transferred to earnings.

Natural Gas Leak Abatement Program (Attachment 2, Lines 15-16)

On January 22, 2015, the CPUC opened Order Instituting Rulemaking 15-01- 008 to implement the provisions of Senate Bill (SB) 1371 (Statutes 2014, Chapter 525). SB 1371 requires the adoption of rules and procedures to minimize natural gas leakage from Commission-regulated natural gas pipeline facilities. On June 15, 2017, the Commission issued D. 17-06-015 which identified 26 Best Practices related to policies and procedures, recordkeeping, training, leak detection, leak repair, and leak prevention.

Additionally, D. 17-06-015 provides for the creation of three new PG&E accounts to record and recover the incremental costs associated with implementation of the 26 Best Practices. The Commission approved Advice 3855-G/G-A which: (1) established a New Environmental Regulations Balancing Account (NERBA) for incremental Natural Gas Leak Abatement Program expenditures; (2) created a Memorandum Account for incremental administrative costs associated with the Natural Gas Leak Abatement Program expenditures; and, (3) created a new Natural Gas Leak Abatement Program one-way balancing account for the costs of Pilot Projects and Research and Development activities.

Pursuant to Decision 17-16-015, PG&E submitted a Tier 3 advice letter with cost forecasts for each best practice on October 31, 2017. PG&E supplemented this advice letter on March 15, 2018, with the associated revenue requirements for the Natural Gas Leak Abatement Program which will be recorded to the NERBA and the NGLAPBA. The Commission adopted PG&E's revenue forecasts for the incremental costs of the 26 Best Practices implementation through Resolution G-3538, on October 11, 2018. PG&E has reflected the 2018 and 2019 natural gas leak abatement revenue requirement of \$43 million in this AGT. Distribution-related costs will be recovered through the Distribution subaccounts of the CFCA and NCA. Transmission related costs will be recovered through the Core Cost subaccount of the CFCA and Noncore subaccount of the NCA.

Gas Transmission and Storage Internal Revenue Service Private Letter Ruling

In D. 16-12-010, Decision Regarding \$850 Million Penalty Allocation for PG&E for Gas Pipeline Safety Enhancements, the Commission created a regulatory liability in the amount of \$688.5 million (\$379.3 million relating to capital costs incurred in 2015 and \$309.2 million relating to capital costs incurred in 2016) as an offset to rate base without adjusting for the rate base impact of the corresponding deferred taxes. To address PG&E's concern that the approach adopted by the Commission could violate the normalization rules of the Internal Revenue Service (IRS), the Commission expressed its intention that PG&E comply with normalization rules and directed PG&E to establish a Tax Normalization Memorandum Account to track relevant costs.

On October 2, 2017, PG&E received a Private Letter Ruling (PLR) from the IRS concluding that the omission of the reduction in deferred income taxes violates the normalization requirements of the Internal Revenue Code. As provided for in D. 16-12-010, PG&E submitted Advice 3909-G on November 14, 2017, to increase its 2015-2018 GT&S revenue requirements. On July 18, 2018, the Commission approved PG&E's advice letter, but noted its direction to PG&E to submit a Petition to Modify D.16-06-056 to reflect the lower corporate tax rate for 2018 in the Tax Cuts and Job Acts of 2017. Adjustments for 2018 will be reflected in customer rates upon approval of PG&E's Petition for Modification of Decision 16-06-056 (see GT&S tax reform section below for further details).

PG&E has reflected the 2015-2018 GT&S revenue requirement adjustments of \$17.5 million as approved in Advice 3909-G, in the GT&S Late Implementation rate components based on the 2018 GT&S revenue requirement allocation by function (i.e., backbone, local transmission and storage).

2019 GRC Annual Adjustments (Attachment 1, Line 2)

On October 5, 2018, PG&E submitted Advice 4028-G/5401-E to implement D. 17-05-013 to: (1) include the GRC adopted 2019 increases in its gas distribution revenue requirement; and (2) update its 2019 RF&U. The 2019 gas distribution attrition increase and currently effective RF&U⁶ are included in Attachment 1, line 2.

Filing in Compliance with Administrative Law Judge Roscow's May 8, 2018 Email Ruling in the 2017 General Rate Case

On May 18, 2018, Administrative Law Judge (ALJ) Roscow issued an email ruling (the Ruling) in PG&E's 2017 GRC proceeding. The Ruling states that "PG&E appears to have confirmed that the 2017 revenue requirement authorized in D.17-05-[013] should have been \$43.279 million lower, because PG&E should have removed that amount from the expense amounts that served as the basis for the settled-upon revenue requirement that was reviewed and adopted by the Commission in D.17-05-[013]." The Ruling directs PG&E to submit a Tier 1 advice letter to "correct this oversight, and reduce its authorized revenue requirement accordingly, or propose a procedural alternate that achieves the same result."

On June 7, 2018, PG&E submitted Advice 3982-G/5306-E in compliance with the Ruling. PG&E proposed two calculations in the advice letter, one as requested by the Ruling and a second calculation. The second calculation, proposed a 2017 revenue reduction of \$21.279 million, comprised of an \$18 million reduction in depreciation expense and a \$3.279 million reduction related to executive compensation expense. Energy Division approved PG&E's Option 2 decrease of

⁶ The RF&U included in this advice letter is 0.013370, as submitted in Advice 4020-G/5389-E on September 27, 2018.

\$21.279 million. PG&E was directed to include the \$21.279 million reduction in its 2019 AET and AGT submittals. PG&E has included the gas portion of the adjustment, \$5.623 million, in this submittal⁷.

Pending Decisions**Tax Reform - GRC**

On March 30, 2018, PG&E submitted a Petition for Modification (PFM) D.17-05-013 concerning PG&E's 2017 GRC, seeking to revise its 2018 and 2019 authorized revenue requirements to reflect the lower corporate tax rate set forth in the Tax Cuts and Jobs Act of 2017 (Tax Act). PG&E proposed to reflect the revised 2018 and 2019 gas revenue requirements in 2019 rates. In this advice letter, PG&E has not yet reflected the revenue requirement adjustment, which will be a net increase for the gas distribution function for these years, but will include in the December AGT if a Decision is approved by year end.

Tax Reform – GT&S

On March 30, 2018, PG&E submitted a PFM of D.16-06-056, as later modified by D.16-12-010, Decision Approving PG&E's 2015 Gas Transmission & Storage (GT&S) rate case, seeking to revise its 2018 authorized revenue requirements to reflect the lower corporate tax rate set forth in the Tax Act. Specifically, PG&E proposed to reduce the adopted 2018 revenue requirement by \$58 million. PG&E proposed to reflect the lower 2018 gas revenue requirement in 2019 rates. In this advice letter, PG&E has not yet reflected the revenue requirement adjustment as this issue is pending before the Commission. PG&E will include an adjustment in the December AGT if a Decision is approved by year end.

Efficiency Savings and Performance Incentive Mechanism (ESPI) – (Attachment 2, Line 9)

The ESPI mechanism was adopted on September 5, 2013, in D.13-09-0234. In D.15 10-028, the Commission updated the timelines for ESPI review to comply with the new EE planning, budget, and review processes adopted in the same decision. The framework of the ESPI program was retained. The IOUs are required to submit an annual advice letter on September 1 of each year to claim their incentive awards.

On July 31, 2018, the Commission notified parties in R.13-11-005 that Commission staff will make changes to the 2018 savings Performance Statement for ESPI to address a dispute in underlying data and draft calculations. The Commission will post a Final Savings Performance Statement. PG&E will submit its Tier 3 ESPI advice letter 30 days following the posting of the Final Savings Performance Statement. The final amount authorized by the Commission will be reflected in the

⁷ The \$5.6 million credit is reflected in the Distribution subaccount of the CFCA and the Distribution subaccount of the NCA.

December AGT supplemental submittal. The amount reflected in this advice letter is equal to the 2015 and partial 2016 award of \$21.9 million.⁸ The gas portion of the award is \$3.3 million and is recovered through the CEEIA rate component.

Greenhouse Gas (GHG) Natural Gas Costs and Revenue Return – (Attachment 1, Lines 8-10)

On March 22, 2018, the Commission approved final decision D. 18-03-017 modifying D. 15-10-032 under Rulemaking 14-03-003. By this decision the Commission distributed GHG allowance proceeds solely to residential customers of the natural gas utilities and provided the necessary legal rationale for that decision, pursuant to the limited rehearing granted by D. 16-04-013. The Commission found that Public Utilities Code Section 453.5 does not apply to allocation of GHG allowance proceeds for the natural gas utilities. Pursuant to California Code of Regulations Chapter 17 Section 95893(d), the Commission adopted an allocation methodology that distributes GHG proceeds solely to residential natural gas customers on a non-volumetric basis.

In addition, the Commission ordered that the residential natural gas California Climate Credit must be distributed in April of each year. GHG compliance costs were included in rates beginning July of 2018. D. 18-03-017 required that the 2018 costs be amortized over 18 months. PG&E's 2019 forecasted greenhouse gas compliance and operational costs total \$187.8 million.⁹ The forecasted 2019 GHG proceeds of \$129 million will be distributed to residential customers on their April 2019 bills. Additionally, PG&E has included Tables A-E as required by D.15-10-032 and D.18-03-017, in Attachment 6 of this advice letter. These tables detail the forecasted and recorded GHG costs, including the Outreach and Administrative expenses, allowance proceeds, and Compliance Obligation over time.

Gas Public Purpose Program Authorized Funding

This AGT incorporates gas PPP surcharge changes that were submitted in Advice 4037-G on October 31, 2018. The gas PPP surcharge rate impacts on customers are shown in Attachment 1.

Public Utilities Code Sections 890-900 and D. 04-08-010 authorize a gas surcharge rate to fund public purpose programs. The gas PPP Surcharge advice letter updates the natural gas PPP surcharge rates to fund authorized energy efficiency (EE), energy savings assistance program (ESA), Statewide Marketing Education and

⁸ On December 14, 2017, the Commission issued Resolution E-4897, approving PG&E's 2015 and partial 2016 ESPI award of \$21.9 million. However, this amount was not recovered in PG&E's 2018 gas and electric rates because it was fully offset by the 2006-2008 Risk/Reward Incentive Mechanism (RRIM) Adjustments.

⁹ Includes \$58.4 million undercollection from 2018.

Outreach (SWME&O) (for EE and ESA), CARE, public-interest research, development and demonstration (RD&D) programs and Board of Equalization (BOE) administrative costs.

The gas PPP surcharges proposed include:

- 1) Total gas PPP authorized program funding of \$161.2 million for EE, ESA, CARE administrative expenses, RD&D, BOE administrative costs and SWME&O administrative costs. This represents a \$1.6 million increase from 2018;
- 2) Amortization over 12 months of forecasted December 31, 2018 balances in the PPP surcharge balancing accounts totaling a \$25.6 million overcollection. This represents an \$2.8 million increase from 2018; and
- 3) A projected 2019 CARE revenue shortfall of \$126.4 million, which represents a \$9.6 million increase from the forecasted 2018 CARE customer discount. This shortfall is included in the PPP-CARE portion of the gas PPP surcharge rates for 2019 and accounted for as a reduction of net transportation revenue requirement in rates for a zero-sum impact on the total gas revenue requirement.

Gas Transmission and Storage Rates

On November 17, 2017, PG&E filed A. 17-11-009, *2019 Gas Transmission & Storage Rate Case*. PG&E requested a revenue requirement of \$1.589 billion, an increase of \$357 million over the 2018 authorized GT&S revenue requirement. A proposed decision is not anticipated prior to year end, therefore PG&E is including the 2018 authorized revenue requirements in rates on January 1, 2019, and until a decision is reached in the 2019 GT&S Rate Case.

The following table shows total annual 2018 revenue requirements authorized by D. 16-12-010, which will be held constant in 2019. A portion of the backbone and the storage revenue requirements shown below are recovered in PG&E's core procurement rates and from Core Transport Agents and are not included in the revenue requirement tables or rates provided in this advice letter. Recovery of these portions of the backbone and storage revenue requirements shown below will occur in PG&E's monthly procurement advice letters effective during 2019.

Annual 2019 Gas Transmission and Storage Revenue Requirements
(\$ thousands)

Total Annual GT&S Revenue Requirements	GT&S 2018
Total Backbone	\$347,453
Total Local Transmission	792,339
Total Storage	90,651
Total Customer Access Charge	2,507
Total GT&S ¹⁰	\$1,232,950

In addition to these 2019 revenue requirements, in this advice letter, PG&E will include \$176.7 million¹¹ in rates on January 1, 2019 related to the net undercollection.

Gas Cost Allocation Proceeding

On September 14, 2017, PG&E filed A. 17-09-006, *2018 Gas Cost Allocation Proceeding*. PG&E requested adoption of an updated throughput and customer forecast, updated cost allocation, updated EG CPUC Fee, NGV Compression Cost, and Core Brokerage Fee components, and changes to its residential gas rate design. A final decision is not anticipated prior to year end, Therefore, the GCAP-related allocations and rate designs included in this 2019 AGT remain those authorized in PG&E's 2010 BCAP (D.10-06-035).

Confidentiality

Per GO 66-C, Section 583 of the Public Utilities Code, and D. 15-10-032, specific values in Attachment 7 are confidential as described in the attached confidentiality declaration.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than November 21, 2018, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor

¹⁰ Totals may not tie due to rounding.

¹¹ See line 21 of Attachment 1. Per D. 16-06-056 and D.16-12-010, the net undercollection is to be collected in rates over 36 months, from August 1, 2016 through July 31, 2019. PG&E will remove the undercollection from rates on August 1, 2019.

San Francisco, California 94102

Facsimile: (415) 703-2200

E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582

E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 submittal be approved within 30 days of submittal (by December 1, 2018), with an effective date of January 1, 2019.

As noted above, illustrative average rates are shown on Attachments 3 through 5 of this submittal. PG&E will submit final rates and preliminary statement changes in a separate December 2018 advice letter that will consolidate all year-end gas transportation rate changes authorized to be effective on January 1, 2019.¹² Changes to core gas transportation rates will be incorporated into the monthly core procurement advice submittal for rates effective January 1, 2019.

¹² The advice letter for monthly core gas procurement rates will be submitted in a separate advice letter in December 2018.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.09-05-026, R.02-10-001, A.13-12-012, A.15-09-001, A.13-09-015, and R.14-03-003. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

- Attachment 1: 2019 Revenue Requirements
 - Attachment 1A: 2019 Revenue Requirements Allocation to Core/Noncore/Unbundled
 - Attachment 2: Balancing Account Forecast Summary
 - Attachment 3: Average End-User Gas Transportation Rates and Public Purpose Program Surcharges
 - Attachment 4: Summary of Rates by Class by Major Elements
 - Attachment 5: Allocation of Gas End-Use Transportation Revenue Requirements and Public Purpose Program Surcharge Revenues across Classes
 - Attachment 6: Natural Gas GHG Tables
 - Public Attachment 6:
 - Table A: Forecast Revenue Requirement
 - Table C: GHG Allowance Proceeds
 - Table D: GHG Outreach and Administrative Expense
 - Table E: Compliance Obligation Over Time
 - Confidential Attachment 6:
 - Table B: Recorded GHG Costs
 - PG&E's 2019 Natural Gas GHG Limit
 - Attachment 7: Confidentiality Declaration
- cc: 2009 Biennial Cost Allocation Proceeding (BCAP) (A.09-05-026) (Public Version)
 Gas PPP Surcharge (R.02-10-001) (Public Version)
 2015 Gas Transmission and Storage Proceeding (A.13-12-012) (Public Version)
 2017 GRC Phase I (A.15-09-001) (Public Version)
 AB 32 Natural Gas Supplier Cost Recovery (A.13-09-015) (Public Version)
 Greenhouse Gas Natural Gas OIR (R.14-03-003) (Public Version)
 Eugene Cadenasso, Energy Division (Public and Confidential Versions)



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 G)

Utility type:

☐ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4038-G

Tier Designation: 2

Subject of AL: Annual Gas True-Up of Gas Transportation Balancing Accounts for Rates Effective January 1, 2019

Keywords (choose from CPUC listing): Compliance, Balancing Account, Agreement, Taxes, Core, Noncore, Procurement

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.05-06-029

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☒ Yes ☐ No

If yes, specification of confidential information: See Attachment 7

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Kimberly Chang, (415)972-5472

Resolution required? ☐ Yes ☒ No

Requested effective date: 1/1/19

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Case: 19-30088 Doc# 1328-3 Filed: 04/10/19 Entered: 04/10/19 17:01:54 Page 19

of 37

¹Discuss in AL if more space is needed.

EXHIBIT 3

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

EXHIBIT 3

Advice Letter 4038-G

ATTACHMENT 1

PACIFIC GAS AND ELECTRIC COMPANY JANUARY 1, 2019 RATE CHANGE

2018 ANNUAL END-USE TRANSPORTATION, GAS TRANSMISSION AND STORAGE REVENUE REQUIREMENTS, AND PUBLIC PURPOSE PROGRAMS AUTHORIZED FUNDING (\$ THOUSANDS)

Line No.		A Present in Rates as of 7/1/18	B Proposed as of 1/1/2019	C Total Change	D Core	E Noncore / Unbundled	Line No.
1	END-USE GAS TRANSPORTATION						1
2	Gas Transportation Balancing Accounts	401,033	339,916	(61,117)	(14,789)	(46,329)	2
3	GRC Distribution Base Revenues (includes distribution portion of Cost of Capital)	1,825,859	1,921,788	95,929	92,586	3,343	3
4	Pension - Distribution	34,290	34,290	-	-	-	4
5	Pension - Gas Transmission & Storage	12,949	12,949	-	-	-	5
6	Self Generation Incentive Program Revenue Requirement	12,990	12,990	-	-	-	6
7	CPUC Fee	7,837	7,837	-	-	-	7
8	Core Brokerage Fee Credit	(6,583)	(6,583)	-	-	-	8
9	Greenhouse Compliance Operational Cost (excluding RF&U)	13,451	25,826	12,375	4,881	7,495	9
10	Greenhouse Compliance Cost (excluding RF&U)	92,599	161,991	69,392	57,494	11,898	10
11	Greenhouse Compliance Revenue Return (including RF&U)	(147,317)	(128,976)	18,341	18,341	-	11
12	Less CARE discount recovered in PPP surcharge from non-CARE customers	(116,811)	(126,435)	(9,624)	(9,624)	-	12
13	RF&U	5,102	7,333	2,231	2,595	(364)	13
14	Total Transportation RRQ with Adjustments and Credits	2,135,399	2,262,926	127,527	151,485	(23,957)	14
15	Procurement-Related G-10 Total	(664)	(657)	7	7	-	15
16	Procurement-Related G-10 Total Allocated	664	657	(7)	(3)	(4)	16
	Total Transportation Revenue Requirements Reallocated	2,135,399	2,262,926	127,527	151,489	(23,961)	
	Gas Transmission & Storage (GT&S) Transportation Revenue Requirements (RRQ)						
17	Local Transmission	792,339	792,339	-	-	-	17
18	Customer Access	2,507	2,507	-	-	-	18
19	Total GT&S Transportation RRQ	794,846	794,846	-	-	-	19
20	2015 GT&S Late Implementation						20
21	Local Transmission	176,147	189,574	13,427	9,054	4,373	21
22	Backbone	5,316	9,297	3,981	1,480	2,501	22
23	Storage	(4,728)	(4,651)	77	65	12	23
24	Total 2015 GT&S Late Implementation	176,735	194,220	17,485	10,599	6,886	24
25	Total End-Use Gas Transportation RRQ	3,106,980	3,251,992	145,013	162,088	(17,075)	25
	PUBLIC PURPOSE PROGRAMS (PPP) FUNDING						
26	Energy Efficiency	68,030	67,877	(153)	(138)	(15)	26
27	Energy Savings Assistance	75,703	77,547	1,844	1,660	185	27
28	Research and Development and BOE/CPUC Admin Fees	11,098	11,221	123	167	(46)	28
29	CARE Administrative Expense	3,696	3,737	41	57	(17)	29
30	Statewide Marketing, Education & Outreach	1,139	854	(285)	(256)	(29)	30
31	Total Authorized PPP Funding	159,666	161,236	1,570	1,490	78	31
32	PPP Surcharge Balancing Accounts	(28,450)	(25,636)	2,814	4,240	(1,426)	32
33	CARE discount recovered from non-CARE customers	116,811	126,435	9,624	6,334	3,290	33
34	Total PPP Required Funding	248,027	262,035	14,008	12,064	1,942	34
	GT&S UNBUNDLED COSTS						
35	Backbone Transmission	217,083	217,083	-	-	-	35
36	Storage	13,783	13,783	-	-	-	36
37	Total GT&S Unbundled	230,866	230,866	-	-	-	37
38	TOTAL REVENUE REQUIREMENTS	3,585,873	3,744,893	159,021	174,152	(15,133)	38

Notes:

A positive balance represents an under-collection. A negative balance represents an over-collection.
Some numbers may not add precisely due to rounding.

ATTACHMENT 1A

PACIFIC GAS AND ELECTRIC COMPANY JANUARY 1, 2019 RATE CHANGE

2018 ANNUAL END-USE TRANSPORTATION, GAS TRANSMISSION AND STORAGE REVENUE REQUIREMENTS, AND PUBLIC PURPOSE PROGRAMS AUTHORIZED FUNDING ALLOCATION TO CORE/NONCORE/UNBUNDLED (\$ THOUSANDS)

Line No.		Proposed as of 1/1/2019	Core	Noncore / Unbundled	Line No.
END-USE GAS TRANSPORTATION					
1	Gas Transportation Balancing Accounts	339,916	298,597	41,319	1
2	GRC Distribution Base Revenues	1,921,788	1,854,883	66,905	2
3	Pension - Distribution	34,290	33,096	1,194	3
4	Pension - Gas Transmission & Storage	12,949	8,221	4,728	4
5	Self Generation Incentive Program Revenue Requirement	12,990	5,149	7,841	5
6	CPUC Fee	7,837	4,808	3,028	6
7	Core Brokerage Fee Credit	(6,583)	(6,583)	-	7
8	Greenhouse Compliance Obligation Cost (excluding RF&U)	25,826	10,185	15,641	8
9	Greenhouse Compliance Cost (excluding RF&U)	161,991	131,655	30,336	9
10	Greenhouse Compliance Revenue Return (excluding RF&U)	(128,976)	(128,976)	-	10
	Less CARE discount recovered in PPP surcharge from non-CARE customers	(126,435)	(126,435)	-	
11					11
12	FF&U	7,333	6,016	1,317	12
13	Total Transportation RRQ with Adjustments and Credits	2,262,926	2,090,617	172,310	13
14	Procurement-Related G-10 Total	(657)	(657)	-	14
15	Procurement-Related G-10 Total Allocated	657	259	398	15
16	Total Transportation Revenue Requirements Reallocated	2,262,926	2,090,219	172,707	16
Gas Transmission & Storage (GT&S) Transportation Revenue Requirements (RRQ)					
17	Local Transmission	792,339	536,850	255,490	17
18	Customer Access	2,507	-	2,507	18
19	Total GT&S Transportation RRQ	794,846	536,850	257,997	19
20	2015 GT&S Late Implementation				20
21	Local Transmission	189,574	130,613	58,961	21
22	Backbone	9,297	(284)	9,581	22
23	Storage	(4,651)	6,839	(11,490)	23
24	Total 2015 GT&S Late Implementation	194,220	137,168	57,052	24
25	Total End-Use Gas Transportation RRQ	3,251,992	2,764,237	487,756	25
PUBLIC PURPOSE PROGRAMS (PPP) FUNDING					
26	Energy Efficiency	67,877	61,078	6,799	26
27	Energy Savings Assistance	77,547	69,780	7,767	27
28	Research and Development and BOE/CPUC Admin Fees	11,221	6,516	4,704	28
29	CARE Administrative Expense	3,737	2,026	1,710	29
30	Statewide Marketing, Education & Outreach	854	768	86	30
31	Total Authorized PPP Funding	161,236	140,169	21,066	31
32	PPP Surcharge Balancing Accounts	(25,636)	(15,076)	(10,560)	32
33	CARE discount recovered from non-CARE customers	126,435	68,565	57,869	33
34	Total PPP Required Funding	262,035	193,659	68,376	34
GT&S UNBUNDLED COSTS					
35	Backbone Transmission	217,083	-	217,083	35
36	Storage	13,783	-	13,783	36
37	Total GT&S Unbundled	230,866	-	230,866	37
38	TOTAL REVENUE REQUIREMENTS	3,744,893	2,957,896	786,997	38

Notes:

A positive balance represents an under-collection. A negative balance represents an over-collection.

Some numbers may not add precisely due to rounding.

ATTACHMENT 2

AL 4038-G

PACIFIC GAS AND ELECTRIC COMPANY JANUARY 1, 2019 RATE CHANGE BALANCING ACCOUNT FORECAST SUMMARY

(\$ THOUSANDS)

Line No.		Balance		Allocation		Balance ¹		Allocation		Line No.
		Sept. 2018 Recorded	Dec. 2018 Forecast	Core	Noncore	Nov. 2017 Recorded	Dec. 2017 Forecast	Core	Noncore	
		A		B	C	A		B	C	
GAS TRANSPORTATION BALANCING ACCOUNTS										
1	Core Fixed Cost Account (CFCA) - Distribution Cost Subaccount	\$213,201		\$213,201	\$0	\$218,650		\$218,650	\$0	1
2	CFCA - Core Cost Subaccount	\$6,546		\$6,546	\$0	\$13,122		\$13,122	\$0	2
3	Noncore Customer Class Charge Account (NCA) - Noncore Subaccount	(\$7,126)		\$0	(\$7,126)	\$2,409		\$0	\$2,409	3
4	NCA - Distribution Subaccount	(\$5,155)		\$0	(\$5,155)	(\$3,530)		\$0	(\$3,530)	4
5	Core Brokerage Fee Balancing Account	\$992		\$992	\$0	\$1,113		\$1,113	\$0	5
6	Hazardous Substance Mechanism	\$91,450		\$36,066	\$55,384	\$83,469		\$32,918	\$50,551	6
7	Balancing Charge Account	(\$261)		(\$103)	(\$158)	482		\$190	\$292	7
8	GT&S Ex Parte Penalty	(\$63,500)		(\$38,322)	(\$25,178)	-		\$0	\$0	8
9	Customer Energy Efficiency Incentive Recovery Account - Gas	\$3,911		\$3,877	\$34	182		\$180	\$2	9
10	California Solar Initiative Thermal Program Memorandum Account	\$6,864		\$4,058	\$2,806	6,722		\$3,983	\$2,740	10
11	Adjustment Mechanism of Costs Determined in Other Proceedings	\$38,173		\$19,086	\$19,087	49,576		\$24,788	\$24,788	11
12	Non-Tariffed Products and Services Balancing Account	(\$220)		(\$220)	\$0	(131)		(\$131)	\$0	12
13	AB 32 Cost of Implementation Fee	\$6,185 (2)		\$3,765	\$2,419	\$6,226		\$3,790	\$2,435	13
14	Gas Pipeline Expense Reimbursement Balancing Account	\$299		\$178	\$121	3,323		\$1,977	\$1,346	14
15	Natural Gas Leak Abatement Program Balancing Account	\$4,689		\$3,974	\$715	-		\$0	\$0	15
16	New Environmental Regulations Balancing Account	\$38,300		\$36,000	\$2,300	-		\$0	\$0	16
17	Pension Contribution Balancing Account	\$0		\$0	\$0	\$0		\$0	\$0	17
18	GT&S Revenue Sharing Mechanism	(\$8,867) (3)		(\$4,433)	(\$4,433)	12,767		\$6,384	\$6,384	18
19	Mobile Home Park Balancing Account	\$14,435		\$13,932	\$503	6,653		\$6,422	\$232	19
20	Subtotal Transportation Balancing Accounts	\$339,916		\$298,597	\$41,319	\$401,033		\$313,386	\$87,649	20
PUBLIC PURPOSE PROGRAM (PPP) SURCHARGE BALANCING ACCOUNTS (4)										
21	PPP-Energy Efficiency	(\$4,064)		(\$3,657)	(\$407)	(\$11,345)		(\$10,208)	(\$1,136)	21
22	PPP-Low Income Energy Efficiency	\$795		\$716	\$80	\$39		\$35	\$4	22
23	PPP-Research Development and Demonstration	(\$128)		(\$75)	(\$54)	(\$258)		(\$147)	(\$111)	23
24	California Alternate Rates for Energy Account	(\$22,239)		(\$12,060)	(\$10,179)	(\$16,886)		(\$8,996)	(\$7,891)	24
25	Subtotal Public Purpose Program Balancing Accounts	(\$25,636)		(\$15,076)	(\$10,560)	(\$28,450)		(\$19,316)	(\$9,134)	25
26	TOTAL BALANCING ACCOUNTS	\$314,280		\$283,521	\$30,759	\$372,583		\$294,070	\$78,513	26

Footnotes:

- These balances are the forecasted balances as of December 2017. The December 2017 ending balances that were provided in the 2018 AGT AL 3919-G were the forecasted balances (based on recorded balances as of November 2017 with a forecast of December 2017 activity).
- This amount reflects the total forecast balance of the AB 32 Cost of Implementation Fee Core subaccount in the CFCA and the Noncore subaccount of the NCA. The total forecast balance is allocated on an equal-cents-per therm basis.
- The balance shown is the September 30, 2018 recorded balance, which will be transferred evenly (50/50) to the CFCA and NCA after the approval of the AGT advice letter.
- The PPP-related balances (based on Sept 2018 recorded) were included in the 2019 PPP Gas Surcharge filed in AL 4037-G on October 31, 2018.

Notes:

A positive balance represents an under-collection. A negative balance represents an over-collection.
Some numbers may not add precisely due to rounding.

ATTACHMENT 3
PACIFIC GAS AND ELECTRIC COMPANY
January 1, 2019 Nov AGT Filing

AVERAGE END-USER GAS TRANSPORTATION RATES AND PUBLIC PURPOSE PROGRAM SURCHARGES
(\$/th; Annual Class Averages)⁽³⁾

Line

No.	Customer Class	7/1/2018 Implementation of GHG Cost Recovery and Pension Reduction			January 1, 2019 Nov AGT Filing			Percentage Change From July 1, 2018		
		(A)								
		Transportation ^(1, 5)	G-PPPS ⁽²⁾	Total	Transportation	G-PPPS	Total	Transportation	G-PPPS	Total
RETAIL CORE										
1	Residential Non-CARE ⁽⁴⁾	\$1.131	\$0.088	\$1.219	\$1.192	\$0.090470	\$1.283	5.4%	2.2%	5.2%
2	Small Commercial Non-CARE ⁽⁴⁾	\$0.736	\$0.042	\$0.778	\$0.771	\$0.043190	\$0.814	4.7%	2.1%	4.5%
3	Large Commercial	\$0.464	\$0.091	\$0.555	\$0.480	\$0.095420	\$0.575	3.4%	4.8%	3.7%
4	NGV1 - (uncompressed service)	\$0.384	\$0.028	\$0.412	\$0.395	\$0.028110	\$0.423	2.8%	1.5%	2.7%
5	NGV2 - (compressed service)	\$1.800	\$0.028	\$1.827	\$1.854	\$0.028110	\$1.882	3.0%	1.5%	3.0%
RETAIL NONCORE - NONCOVERED ENTITIES ⁽⁶⁾										
6	Industrial - Distribution	\$0.309	\$0.042	\$0.351	\$0.330	\$0.043510	\$0.373	6.8%	2.9%	6.3%
7	Industrial - Transmission	\$0.165	\$0.034	\$0.199	\$0.178	\$0.034390	\$0.213	7.8%	2.4%	6.9%
8	Industrial - Backbone	\$0.054	\$0.034	\$0.088	\$0.069	\$0.034390	\$0.103	27.6%	2.4%	18.0%
9	Electric Generation - Transmission (G-EG-D/LT)	\$0.156		\$0.156	\$0.168		\$0.168	8.0%		8.0%
10	Electric Generation - Backbone (G-EG-BB)	\$0.053		\$0.053	\$0.068		\$0.068	28.3%		28.3%
11	NGV 4 - Distribution (uncompressed service)	\$0.309	\$0.028	\$0.337	\$0.330	\$0.028110	\$0.358	6.8%	1.5%	6.3%
12	NGV 4 - Transmission (uncompressed service)	\$0.156	\$0.028	\$0.184	\$0.168	\$0.028110	\$0.197	7.9%	1.5%	6.9%
WHOLESALE CORE AND NONCORE (G-WSL) (1)										
13	Alpine Natural Gas	\$0.126		\$0.126	\$0.118		\$0.118	(6.20%)		(6.20%)
14	Coalinga	\$0.126		\$0.126	\$0.118		\$0.118	(6.19%)		(6.19%)
15	Island Energy	\$0.137		\$0.137	\$0.130		\$0.130	(5.69%)		(5.69%)
16	Palo Alto	\$0.124		\$0.124	\$0.116		\$0.116	(6.32%)		(6.32%)
17	West Coast Gas - Castle	\$0.317		\$0.317	\$0.320		\$0.320	0.79%		0.79%
18	West Coast Gas - Mather Distribution	\$0.374		\$0.374	\$0.380		\$0.380	1.56%		1.56%
19	West Coast Gas - Mather Transmission	\$0.127		\$0.127	\$0.119		\$0.119	(6.14%)		(6.14%)

(1) Transportation Only rates include: i) a transportation component that recovers customer class charges, customer access charges, CPUC fees, local transmission (where applicable), distribution costs (where applicable), and AB32 Cost of Implementation Fee (wholesale and certain large customers are directly billed by the Air Resource board, and are exempt from PG&E's AB32 COI rate component of \$0.00132 per therm). Transport only customers must arrange for their own gas purchases and transportation to PG&E's citygate/local transmission system.

(2) D. 04-08-010 authorized PG&E to remove the gas public purpose program surcharge that recovers the costs of low income California Alternate Rates for Energy (CARE), low income energy efficiency, energy efficiency, Research Development and Demonstration program and BOE/CPUC Administration costs from transportation rates and into its own separate surcharge tariff. Certain customers are exempt from paying the PPP surcharge; see tariff G-PPPS for details. G-PPPS rates are determined annually in PG&E's PPP Filing.

(3) Rates are rounded to 3 decimals for viewing ease. Percentage rate changes are calculated on a 5-digit basis.

(4) CARE Customers receive a 20% discount off of PG&E's total bundled rate and are exempt from the CARE portion of PG&E's Public Purpose Program Surcharge (G-PPPS) rates and cost recovery of the California Solar Initiative Thermal Program.

(5) Billed Transportation rates paid by all customers include an additional GHG Compliance Cost of \$0.04618 and Operational Cost component of \$0.00356

(6) Covered Entities within classes and the wholesale class (i.e. customers that currently have a direct obligation to pay for allowances directly to the Air Resources Board) will see a line item credit on their bill equal to the GHG Compliance Cost \$0.04618 per therm times their monthly billed volumes.

Attachment 4
PACIFIC GAS AND ELECTRIC COMPANY
JANUARY 1, 2019 NOV AGT FILING
SUMMARY OF RATES (excluding procurement) BY CLASS BY MAJOR ELEMENTS
(\$/th; Annual Class Averages)⁽⁹⁾

		Core Retail					Noncore Retail						
		Non-CARE Residential	Sml Com.	Lg. Comm.	G-NGV1 (Uncompressed)	G-NGV2 (Compressed)	Distribution	Transmission	BB-Level Serv.	Distribution	Transmission	Dist./Trans.	BB-Level Serv.
TRANSPORTATION CHARGE COMPONENTS													
1	Local Transmission (1)	\$.18988	\$.18988	\$.18988	\$.18988	\$.18988	\$.08286	\$.08286	\$.00000	\$.08286	\$.08286	\$.08286	\$.00000
2	Self Generation Incentive Program	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180	\$.00180
3	CPUC Fee (3)	\$.00168	\$.00168	\$.00168	\$.00168	\$.00168	\$.00168	\$.00168	\$.00168	\$.00168	\$.00168	\$.00007	\$.00007
4	AB32 Air Resource Board Cost of Implementation Fee (8)	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132	\$.00132
5	AB32 Greenhouse Gas Compliance & Obligation Cost	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974
6	Balancing Accounts (2)	\$.11836	\$.06577	\$.02913	\$.01842	\$.20078	\$.00153	\$.00919	\$.01372	\$.00153	\$.00969	\$.00788	\$.01191
8	2015 GT&S Late Implementation Shortfall Amortization	\$.04983	\$.04983	\$.04983	\$.04983	\$.04983	\$.01920	\$.01920	(\$.00044)	\$.01920	\$.01920	\$.01920	(\$.00044)
9	GT&S Pension	\$.00284	\$.00284	\$.00284	\$.00284	\$.00284	\$.00128	\$.00128	\$.00040	\$.00128	\$.00128	\$.00128	\$.00040
10	Distribution - Annual Average (6)	\$.77685	\$.34880	\$.14890	\$.07780	\$ 1.35598	\$.16614	\$.01024		\$.16614		\$.00321	\$.00321
11	VOLUMETRIC RATE - Average Annual	\$ 1.19230	\$.71166	\$.47512	\$.39330	\$ 1.85385	\$.32556	\$.17732	\$.06822	\$.32556	\$.16756	\$.16736	\$.06801
12	CUSTOMER ACCESS CHARGE - Class Average Volumetric Equivalent (4)		\$.05888	\$.00449	\$.00120		\$.00436	\$.00092	\$.00074	\$.00436	\$.00092	\$.00063	\$.00019
13	CLASS AVERAGE TRANSPORTATION RATE	\$ 1.19230	\$.77054	\$.47960	\$.39450	\$ 1.85385	\$.32992	\$.17824	\$.06896	\$.32992	\$.16849	\$.16799	\$.06820
14	PUBLIC PURPOSE PROGRAM SURCHARGE/TAX (5)	\$.09047	\$.04319	\$.09542	\$.02811	\$.02811	\$.04351	\$.03439	\$.03439	\$.02811	\$.02811		
15	END-USE RATE (7)	\$ 1.28277	\$.81373	\$.57502	\$.42261	\$ 1.88196	\$.37343	\$.21263	\$.10335	\$.35803	\$.19660	\$.16799	\$.06820

	Wholesale						
	Coalinga	Palo Alto	WC Gas Mather		Island Energy	Alpine	WC Gas Castle
			Dist.	Trans.			
TRANSPORTATION CHARGE COMPONENTS							
15 Local Transmission (1)	\$.08286	\$.08286	\$.08286	\$.08286	\$.08286	\$.08286	\$.08286
16 Self Generation Incentive Program							
17 CPUC Fee (3)	\$.00000	\$.00000	\$.00000	\$.00000	\$.00000	\$.00000	\$.00000
18 AB32 Air Resource Board Cost of Implementation Fee (8)	\$.00000	\$.00000	\$.00000	\$.00000	\$.00000	\$.00000	\$.00000
19 AB32 Greenhouse Gas Compliance & Obligation Cost	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974	\$.04974
20 Balancing Accounts (2)	\$.00801	\$.00801	\$ (0.00519)	\$.00801	\$.00801	\$.00801	\$ (0.00195)
21 2015 GT&S Late Implementation Shortfall Amortization	\$.01920	\$.01920	\$.01920	\$.01920	\$.01920	\$.01920	\$.01920
22 GT&S Pension	\$.00128	\$.00128	\$.00128	\$.00128	\$.00128	\$.00128	\$.00128
23 Distribution - Annual Average			\$.27370				\$.20670
24 VOLUMETRIC RATE - Average Annual	\$.16109	\$.16109	\$.42159	\$.16109	\$.16109	\$.16109	\$.35782
25 CUSTOMER ACCESS CHARGE - Class Average Volumetric Equivalent (4)	\$.00350	\$.00093	\$.00454	\$.00454	\$.01464	\$.00317	\$.00787
26 CLASS AVERAGE TRANSPORTATION RATE	\$.16459	\$.16201	\$.42613	\$.16563	\$.17573	\$.16426	\$.36569
27 PUBLIC PURPOSE PROGRAM SURCHARGE/TAX (5)							
28 END-USE RATE	\$.16459	\$.16201	\$.42613	\$.16563	\$.17573	\$.16426	\$.36569
28 GHG COMPLIANCE COST EXEMPTION(9)	\$.04618	\$.04618	\$.04618	\$.04618	\$.04618	\$.04618	\$.04618
28 END-USE RATE EXCLUDING GHG COMPLIANCE	\$.11841	\$.11583	\$.37995	\$.11945	\$.12955	\$.11808	\$.31951

NOTES

- (1) Adopted in Decision 16-12-010 filed with Advice Letter 3788-G Attachment 6 Appendix J Table 22
- (2) Based on September recorded balances and forecasted through December.
- (3) CPUC Fee based on Resolution M-4830, effective January 1, 2017 (including FF&U). G-EG customers pay a reduced CPUC fee per the 2010 BCAP D.10-06-035.
- (4) Adopted in Decision 16-12-010 filed with Advice Letter 3788-G Attachment 6 Appendix J Table 23
- (5) Decision 04-08-010 ordered the removal of PPP cost recovery from transportation rates. On March 1, 2005 PG&E began to treat PPP as a tax. AL 3901-G updated PG&E's 2018 PPP Surcharges effective January 1, 2018.
- (6) The G-NGV2 Distribution rate component includes the cost of compression, station operations and maintenance, and state/federal gas excise taxes, and the average A-10 electric rate.
- (7) CARE Customers receive a 20% discount off of PG&E's total bundled rate and are exempt from the CARE portion of PG&E's Public Purpose Program Surcharge (G-PPPS) rates and cost recovery of the California Solar Initiative Thermal Program.
- (8) AB32 provides the Air Resource Board recovery of its administration costs associated with the implementation of AB32. Wholesale and certain large customers are directly billed by the ARB, and are exempt from PG&E's cost of implementation component of \$0.00132 per therm
- (9) Billed Transportation rates paid by all customers include an additional GHG Compliance Cost of \$0.04618 and Operational Cost component of \$0.00356. Covered Entities within classes and the wholesale class (i.e. customers that currently have a direct obligation to pay for allowances directly to the Air Resource Board) will see a line credit on their bill equal to the GHG Compliance Cost \$0.04618 per therm times their monthly billed therms
- (10) Rates are unrounded

Attachment 5

PACIFIC GAS AND ELECTRIC COMPANY

January 1, 2019 Nov AGT Filing

ALLOCATION OF GAS END-USE TRANSPORTATION REVENUE REQUIREMENTS AND PUBLIC PURPOSE PROGRAM SURCHARGE REVENUES ACROSS CLASSES (\$000)

Line No.	GAS GRC, ATTRITION, PENSION & COST OF CAPITAL DISTRIBUTION-LEVEL REVENUE REQUIREMENTS	TOTAL	Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
1	Customer	\$1,052,855	\$918,586	\$122,415	\$2,619	\$106	\$0	\$1,043,726	\$6,481	\$368	\$0	\$2,279	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$9,128
2	+ Distribution	\$874,322	\$609,762	\$196,353	\$8,664	\$1,470	\$0	\$816,249	\$37,334	\$14,160	\$0	\$6,270	\$0	\$0	\$0	\$0	\$172	\$0	\$137	\$0	\$58,073
3	+ G-NGV2 Compression Cost	\$3,093	\$0	\$0	\$0	\$0	\$3,093	\$3,093	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	Allocation of Base Distribution Franchise Fees	\$19,186	\$15,191	\$3,168	\$112	\$16	\$31	\$18,518	\$436	\$144	\$0	\$85	\$0	\$0	\$0	\$0	\$2	\$0	\$1	\$0	\$668
5	Allocation of Base Distribution Uncollectibles Expense	\$6,622	\$5,244	\$1,094	\$39	\$5	\$11	\$6,392	\$150	\$50	\$0	\$29	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$230
6	Final Allocation of Distribution Revenue Requirement	\$1,956,078	\$1,548,783	\$323,030	\$11,434	\$1,597	\$3,135	\$1,887,979	\$44,401	\$14,723	\$0	\$8,663	\$0	\$0	\$0	\$0	\$173	\$0	\$139	\$0	\$68,099
7	Distribution-Level Revenue Requirement Allocation %	100.00000%	79.17796%	16.51417%	0.58455%	0.08166%	0.16025%	96.51859%	2.26989%	0.75269%	0.00000%	0.44288%	0.00000%	0.00000%	0.00000%	0.00000%	0.00886%	0.00000%	0.00709%	0.00000%	3.48141%

Total Core Brokerage Fee (w/out F&U) (6,496) (6,583) With F&U

	CUSTOMER CLASS COSTS WITHOUT RATE COMPONENTS	TOTAL	Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
8	Core Fixed Cost Acct. Bal. - Distribution Cost Subaccount	\$213,201	\$174,897	\$36,478	\$1,291	\$180	\$354	\$213,201	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9	Core Fixed Cost Acct. Bal. - Core Cost Subaccount - ECPT (2016 PSEP)	\$6,546	\$4,542	\$1,790	\$168	\$46	\$0	\$6,546	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
10	Mobile Home Parks Balancing Account	\$14,435	\$11,429	\$2,384	\$84	\$12	\$23	\$13,932	\$328	\$109	\$0	\$64	\$0	\$0	\$0	\$0	\$1	\$0	\$1	\$0	\$503
11	Noncore Customer Class Charge Account - ECPT	(\$7,126)	\$0	\$0	\$0	\$0	\$0	\$0	(\$417)	(\$2,301)	(\$19)	(\$4,321)	(\$8)	(\$4)	(\$51)	(\$1)	(\$2)	(\$1)	(\$1)	(\$57)	(\$7,126)
12	Noncore Customer Class Charge Account - Distribution Subacct	(\$5,155)	\$0	\$0	\$0	\$0	\$0	\$0	(\$3,361)	(\$1,115)	\$0	(\$656)	\$0	\$0	\$0	\$0	(\$13)	\$0	(\$10)	\$0	(\$5,155)
13	Gas Leak Survey & Repair Balancing Account	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14	CFCA - NGSS Enduser Dist. Sub Acct Recovery	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15	Gas Pipeline Expense & Capital BA (2016 is for CPUC Reimb sub)	\$299	\$124	\$49	\$5	\$1	\$0	\$178	\$7	\$39	\$0	\$73	\$0	\$0	\$1	\$0	\$0	\$0	\$0	\$1	\$121
16	Hazardous Substance Balance	\$91,450	\$25,026	\$9,860	\$928	\$252	\$0	\$36,066	\$3,241	\$17,884	\$145	\$33,588	\$65	\$30	\$397	\$8	\$13	\$7	\$8	\$442	\$55,384
17	Non-Tariffed Products and Services	(\$220)	(\$152)	(\$60)	(\$6)	(\$2)	\$0	(\$220)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18	Core Brokerage Fee Credit (Gas Brokerage Costs w/o FF&U)	(\$5,468)	(\$3,795)	(\$1,495)	(\$141)	(\$38)	\$0	(\$5,468)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
19	Core Brokerage Fee Credit (Sales/Marketing Costs w/o FF&U)	(\$1,028)	(\$904)	(\$121)	(\$3)	(\$0)	\$0	(\$1,028)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
20	GT&S Ex_Parte Penalty	(\$63,500)	(\$26,592)	(\$10,477)	(\$986)	(\$267)	\$0	(\$38,322)	(\$1,733)	(\$9,566)	(\$31)	(\$13,564)	(\$35)	(\$16)	(\$212)	(\$4)	(\$7)	(\$4)	(\$4)	(\$237)	(\$25,178)
21	Balancing Charge Account	(\$261)	(\$71)	(\$28)	(\$3)	(\$1)	\$0	(\$103)	(\$9)	(\$51)	(\$0)	(\$96)	(\$0)	(\$0)	(\$1)	(\$0)	(\$0)	(\$0)	(\$0)	(\$1)	(\$158)
22	G-10 Procurement-related Employee Discount Allocated	\$657	\$180	\$71	\$7	\$2	\$0	\$259	\$23	\$128	\$1	\$241	\$0	\$0	\$3	\$0	\$0	\$0	\$0	\$3	\$398
23	Brokerage Fee Balance Account	\$992	\$688	\$271	\$26	\$7	\$0	\$992	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24	Adjust. Mechanism Costs Determined Other Proceedings	\$38,173	\$13,244	\$5,218	\$491	\$133	\$0	\$19,086	\$1,117	\$6,163	\$50	\$11,575	\$22	\$10	\$137	\$3	\$4	\$3	\$3	\$152	\$19,086
25	G-10 Procurement-related Employee Discount Applied to Res Class	(\$657)	(\$657)	\$0	\$0	\$0	\$0	(\$657)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26	New Environmental Regulations Balancing Account(Transmission)	\$1,694	\$464	\$183	\$17	\$5	\$0	\$668	\$60	\$331	\$3	\$622	\$1	\$1	\$7	\$0	\$0	\$0	\$0	\$8	\$1,026
27	Natural Gas Leak Abatement Program Balancing Account (Transmission)	\$966	\$264	\$104	\$10	\$3	\$0	\$381	\$34	\$189	\$2	\$355	\$1	\$0	\$4	\$0	\$0	\$0	\$0	\$5	\$585
28	New Environmental Regulations Balancing Account(Distribution)	\$36,605	\$28,983	\$6,045	\$214	\$30	\$59	\$35,331	\$831	\$276	\$0	\$162	\$0	\$0	\$0	\$0	\$3	\$0	\$3	\$0	\$1,274
29	Noncore Gas Pipeline Safety Balancing Account	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
30	GT&S Revenue Sharing Mechanism	(\$8,867)	(\$3,076)	(\$1,212)	(\$114)	(\$31)	\$0	(\$4,433)	(\$259)	(\$1,432)	(\$12)	(\$2,689)	(\$5)	(\$2)	(\$32)	(\$1)	(\$1)	(\$1)	(\$1)	(\$35)	(\$4,433)
31	CFCA/NCA - NGSS Enduser Sub Acct Recovery	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32	Self Gen Incentive Program Forecast Period Cost	\$12,990	\$3,573	\$1,408	\$132	\$36	\$0	\$5,149	\$463	\$2,553	\$21	\$4,795	\$9	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,841
	NCA - NGSS Enduser Sub Acct Recovery	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Natural Gas Leak Abatement Program Balancing Account (Distribution)	\$3,723	\$2,948	\$615	\$22	\$3	\$6	\$3,593	\$85	\$28	\$0	\$16	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$130
33	Subtotals of Items Transferred to CFCA and NCA	\$329,449	\$231,114	\$51,081.99	\$2,143.18	\$369.97	\$442	\$285,151	\$407.53	\$13,235.38	\$159.06	\$30,165.75	\$50.73	\$19.18	\$252.77	\$4.86	(\$0.31)	\$4.67	(\$1.30)	\$281	\$44,298
34	Franchise Fees and SF Gross Receipts and Uncoll. Exp. on Items Above	\$4,404	\$3,090	\$683	\$29	\$5	\$6	\$3,812	\$5	\$177	\$2	\$403	\$1	\$0	\$3	\$0	(\$0)	\$0	(\$0)	\$3	\$591
35	Subtotals with FF&U and Other Bal. Acct./Forecast Period Costs	\$333,853	\$234,204	\$51,765	\$2,172	\$375	\$448	\$288,963	\$413	\$13,412	\$161	\$30,569	\$51	\$19	\$255	\$5	(\$0)	\$5	(\$1)	\$284	\$44,890
36	Total of Items Collected via CFCA, NCA, and NDFCA	\$2,289,931	\$1,782,987	\$374,795	\$13,606	\$1,972	\$3,582	\$2,176,942	\$44,814	\$28,136	\$161	\$39,232	\$51	\$19	\$255	\$5	\$173	\$5	\$137	\$284	\$112,989

	CUSTOMER CLASS COSTS WITH THEIR OWN RATE COMPONENTS ALLOCATED USING BCAP THROUGHPUT	TOTAL	Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
37	CEE Incentive	\$3,911	\$3,412	\$455	\$10	\$0	\$0	\$3,877	\$24	\$1	\$0	\$8	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$34
38	AB32 ARB Implementation Fee	\$6,185	\$2,613	\$1,029	\$97	\$26	\$0	\$3,765	\$338	\$1,862	\$15	\$198	\$7	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,419
39	CA Solar Hot Water Heating	\$6,864	\$2,606	\$1,297	\$122	\$33	\$0	\$4,058	\$426	\$2,352	\$19	\$0	\$9	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,806
40		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
41	AB32 GHG Operations Cost	\$25,826	\$7,068	\$2,785	\$262	\$71	\$0	\$10,185	\$915	\$5,050	\$41	\$9,485	\$18	\$9	\$112	\$2	\$4	\$2	\$2	\$125	\$15,641
42	AB32 GHG Compliance Cost	\$161,991	\$91,639	\$35,894	\$3,208	\$913	\$0	\$131,655	\$11,599	\$12,439	\$67	\$5,994	\$238	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$30,336
43	AB32 Cap & Trade - Allowance Return (Incl. RF&U)	(\$128,976)	(\$128,976)	\$0	\$0	\$0	\$0	(\$128,976)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
44	CPUC FEE	\$7,837	\$3,338	\$1,313	\$124	\$34	\$0	\$4,808	\$432	\$2,386	\$19	\$182	\$9	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,028
45	Subtotals for Customer Class Charge Items	\$83,638	(\$18,299)	\$42,772	\$3,823	\$1,077	\$0	\$29,373	\$13,734	\$24,091	\$161	\$15,868	\$281	\$9	\$112	\$2	\$4	\$2	\$2	\$125	\$54,265
46	Franchise Fees and SF Gross Receipts and Uncoll. Exp. on Items Above	\$2,843	\$1,480	\$572	\$51	\$14	\$0	\$2,117	\$184	\$322	\$2	\$212	\$4	\$0	\$1	\$0	\$0	\$0	\$0	\$2	\$726
47	Subtotals of Other Costs	\$86,480	(\$16,820)	\$43,344	\$3,874	\$1,091	\$0	\$31,490	\$13,917	\$24,413	\$163	\$16,080	\$285	\$9	\$114	\$2	\$4	\$2	\$2	\$127	\$54,991
48	Allocation of Total Transportation Costs prior to GT&S-related Costs	\$2,376,411	\$1,766,167	\$418,139	\$17,480	\$3,064	\$3,582	\$2,208,432	\$58,731	\$52,548	\$324	\$55,312	\$336	\$28	\$369	\$7	\$177	\$7	\$140	\$411	\$167,979

Attachment 5 (continued)

CUSTOMER CLASS COST FOR 2015 GTS LISA ALLOCATED BASED ON 2017 GT&S THROUGHPUT		TOTAL	Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
49	Local Transmission Expense (Forecast Period Cost)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
50	Local Transmission Balancing Account	\$189,574	\$88,920	\$36,801	\$3,609	\$1,283	\$0	\$130,613	\$4,842	\$30,771	\$0	\$22,569	\$74	\$48	\$605	\$12	\$20	\$8	\$12	\$673	\$58,961
51	Backbone Transmission Expense (Forecast Period Cost)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
52	Backbone Transmission Balancing Account	\$9,297	(\$194)	(\$80)	(\$8)	(\$3)	\$0	(\$284)	\$545	\$3,465	\$40	\$5,443	\$8	\$5	\$68	\$1	\$2	\$1	\$1	\$76	\$9,581
53	Storage (Forecast Period Cost)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
54	Storage Balancing Account	(\$4,652)	\$4,656	\$1,927	\$189	\$67	\$0	\$6,839	(\$654)	(\$4,156)	(\$48)	(\$6,527)	(\$10)	(\$6)	(\$82)	(\$2)	(\$3)	(\$1)	(\$2)	(\$91)	(\$11,490)
55	Subtotal of 2015 GTS LISA in 2016 Rates	\$194,219	\$93,382	\$38,648	\$3,790	\$1,347	\$0	\$137,167	\$4,733	\$30,081	(\$8)	\$21,485	\$72	\$47	\$591	\$12	\$19	\$8	\$12	\$658	\$57,052

GT&S Pension			Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
56	GT&S Pension Including FF&U	\$12,949	\$5,705	\$2,248	\$211	\$57	\$0	\$8,221	\$335	\$1,846	\$5	\$2,488	\$7	\$3	\$41	\$1	\$1	\$1	\$1	\$46	\$4,728
57	Net End-User Transportation Excluding LT and CAC	\$2,583,580	\$1,865,254	\$459,034	\$21,481	\$4,468	\$3,582	\$2,353,820	\$63,799	\$84,475	\$321	\$79,285	\$415	\$78	\$1,001	\$20	\$197	\$15	\$153	\$1,114	\$229,760

ADOPTED REVENUE REQUIREMENTS ALLOCATIONS FOR GAS ACCORD ITEMS IN TRANSPORTATION		TOTAL	Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
58	Local Transmission (w/applied seed value)	771,375	355,812	147,258	14,442	5,133		522,645	20,426	129,810		95,207	313	203	2,552	51	83	33	53	2,838	248,730
59	Customer Access Charge	2,507	0	0	0			0	0	1,465	13	975		9	29	2	5	6	5	45	2,507
60	Total End-User Gas Accord Transportation Costs	773,882	355,812	147,258	14,442	5,133	0	522,645	20,426	131,275	13	96,182	313	211	2,581	53	88	39	58	2,883	251,237
61	Gross End-User Transportation Costs in Rates	3,357,462	2,221,066	606,293	35,923	9,601	3,582	2,876,465	84,225	215,751	334	175,467	728	289	3,582	72	285	54	210	3,997	480,997
62	Less Forecast CARE Discount recovered in PPP Surcharges	126,435	126,435					126,435													0
63	Net End-User Transportation Costs in Rates	3,231,027	2,094,631	606,293	35,923	9,601	3,582	2,750,030	84,225	215,751	334	175,467	728	289	3,582	72	285	54	210	3,997	480,997

Line No.	ALLOCATION OF PUBLIC PURPOSE PROGRAM SURCHARGES UNDER PER PG&E AL 3161-G	TOTAL	Residential*	Small Commercial*	Large Commercial	Core NGV	Compression Cost for G-NGV2	Subtotal Core	Industrial Distribution	Industrial Transmission	Industrial Backbone	Electric Gen	Noncore NGV	Coalinga	Palo Alto	Alpine Natural Gas	WC Gas Mather**	Island Energy	WC Gas Castle**	All Other Wholesale	Noncore & Wholesale
64	PPP-EE Surcharge	68,731	54,174	5,513	2,161	0		61,847	1,847	4,996	40		0								6,884
65	PPP-EE Balancing Account	(4,064)	(3,203)	(326)	(128)	0		(3,657)	(109)	(295)	(2)		0								-407
66	PPP-ESA Surcharge	77,547	61,122	6,220	2,438	0		69,780	2,084	5,637	46		0								7,767
67	PPP-ESA Balancing Account	795	627	64	25	0		716	21	58	0		0								80
68	PPP - RD&D Programs	10,713	4,222	1,777	156	67		6,222	583	3,863	31		15								4,492
69	PPP - RD&D Balancing Account	(128)	(51)	(21)	(2)	(1)		(75)	(7)	(46)	(0)		(0)								-54
70	PPP-CARE Discount Allocation Set Annually	126,435	42,901	22,785	2,009	869		68,565	7,510	49,768	403		189								57,869
71	PPP-CARE Administration Expense	3,737	1,268	673	59	26		2,026	222	1,471	12		6								1,710
72	PPP-CARE Balancing Account	(22,239)	(7,546)	(4,008)	(353)	(153)		(12,060)	(1,321)	(8,754)	(71)		(33)								-10,179
73	PPP-Admin Cost for BOE and CPUC	507	200	84	7	3		294	28	183	1		1								213
74	Subtotal of Public Purpose Program Surcharges	\$262,035	\$153,714	\$32,762	\$6,372	\$812	\$0	\$193,660	\$10,858	\$56,880	\$460	\$0	\$177	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$68,376
75	Totals by End-User Customer Class (excludes Unbundled GT&S)	\$3,493,062	\$2,248,345	\$639,054	\$42,295	\$10,413	\$3,582	\$2,943,690	\$95,083	\$272,631	\$795	\$175,467	\$905	\$289	\$3,582	\$72	\$285	\$54	\$210	\$3,997	\$549,372
76	Unbundled Gas Transmission and Storage Revenue Requirement	\$230,866																			

TOTAL GAS REVENUE REQUIREMENT AND PPPS FUNDING REQUIREMENT IN RATES		
77	Total Transportation, PPPS, and Unbundled Costs	\$3,723,928
78	Cross-check with Gas Revenue Requirement Table	\$3,744,893
79	Difference	20,965
80	Reconciliation Due to Local Transmission Seed Credit	20,965
81	Difference	0

(Total of lines 75 + 76)
Rev Req Model Output_Values tab or Attachment 1 Line 35
(Due to Rounding in Attachment 1)

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Attachment 6

**Natural Gas GHG Tables
(Public)**

Illustrative Natural Gas GHG Rate Impacts

D.15-10-032, Decision Adopting Procedures Necessary For Natural Gas Corporations To Comply With The California Cap On Greenhouse Gas Emissions And Market-Based Compliance**Table A: Forecast Revenue Requirement**

Line	Description	2018		2019	
		Forecast	Recorded/ Forecast	Forecast	Recorded
1	Gross Throughput (MMcf) (See Note 3)	675,808	668,442	669,680	
2	Throughput to Covered Entities (MMcf)	(371,624)	(366,722)	(364,638)	
3	Net Throughput to End Users (MMcf) (Line 1 + Line 2)	304,184	301,720	305,042	
4	Lost and Unaccounted for Gas (MMcf)	10,654	12,551	10,316	
5	Total Supplied Gas (MMcf) (Line 3 + Line 4)	314,838	314,271	315,358	
6	Emissions Conversion Factor (MTCO ₂ e/MMcf)	54.64		54.64	
6a	LUAf MTCO ₂ e, (Line 4 * Line 6)	582,181		563,711	
7	Compliance for End Users excluding LUAf (MTCO ₂ e) (Line 3 * Line 6)	16,621,942		16,668,827	
8	Compliance Obligation for Company Facilities (MTCO ₂ e)	282,828		259,032	
9	Gross Compliance Obligation (MTCO₂e) (Line 6a + Line 7 + Line 8)	17,486,952		17,491,571	
10	Directly Allocated Allowances	(17,778,400)		(17,398,006)	
11	Percentage Consigned to Auction	40%		45%	
12	Consigned Allowances (Line 10 * Line 11) (see Note 1)	7,111,360		7,829,103	
13	Net Compliance Obligation (MTCO₂e) (Line 9 + Line 10 + Line 12)	6,819,912		7,922,667	
14	Proxy GHG Allowance Price	15.55		16.33	
15	Compliance Instrument Cost* (see Note 2)	\$ 106,049,624	\$ 105,425,707	\$ 129,377,157	
16	Interest*/Financing Costs		\$ 3,158,619		
17	Revenue Fees & Uncollectibles	\$ 1,422,232	\$ 1,413,864	\$ 1,729,773	
18	Revenue Requirement (Line 15 + Line 16 + Line 17)	\$ 107,471,856	\$ 106,839,572	\$ 131,106,930	
19	Previous Years Cost Balancing Subaccount Balance			\$ 58,440,410	
20	Revenue Requirement to be Included in Rates (Line 18 + Line 19)			\$ 189,547,340	
21	Covered Entity Rate Impact (\$/therm)		\$ 0.00185	\$ 0.00356	
22	Non-Covered Entity Rate Impact (\$/therm)		\$ 0.02785	\$ 0.04974	

*Recorded costs through September 2018

CONFIDENTIAL INFORMATION

NOTES

- Year 2018 Recorded: Represents the allowances consigned in 2018 through 9/30/18 and forecast based on the the allowances to be consigned (based on total 2018 consigned allowances divided by 4)
- Line 15 of the Recorded column for 2018 Recorded includes 9 months actual and 3 months forecasted data. Costs covered Natural Gas end-users and compressor stations.
- Lines 1-9 of the 2018 Recorded/Forecast column includes January-June actuals and July-December forecasted data.

EXHIBIT 3

Table C: GHG Allowance Proceeds

Line	Description	2018		2019	
		Forecast	Recorded/ Forecast	Forecast	Recorded
1	Proxy GHG Allowance Price (\$/MT)	\$ 15.55	14.96	\$ 16.33	
2	Directly Allocated Allowances	17,778,400	17,778,400	17,398,006	
3	Percentage Consigned to Auction	40%	40%	45%	
4	Consigned Allowances	7,111,360	7,111,360	7,829,103	
5	Allowance Proceeds (See Note 1)	\$ (110,581,648)	\$ (106,412,613)	\$ (127,849,247)	
6	Previous Year's Revenue Balancing Subaccount Balance (See Note 2)				
7	Interest*		\$ (3,276,331)		
8	Subtotal Allowance Proceeds (\$) (Line 5 + Line 6 + Line 7)	\$ (110,581,648)	\$ (109,688,944)	\$ (127,849,247)	\$ -
9	Outreach and Admin Expenses (\$)* (from Table D)	\$ 1,152,303	\$ 843,778	\$ 575,270	
9a	Revenue Fees & Uncollectibles	\$ (1,467,557)	\$ (1,459,723)	\$ (1,701,653)	
10	Net GHG Proceeds Available for Customer Returns (\$) (Line 8 + Line 9)	\$ (110,896,902)	\$ (110,304,888)	\$ (128,975,630)	
11	2015-2017 Net of Costs and Proceeds included in October 2018 Customer Credit		\$ (38,395,768)		
12	Number of Residential Households		5,001,522	5,061,931	
13	Per Household California Climate Credit (\$) ((Line 10+Line 11) / Line 12)		\$ (29.73)	\$ (25.48)	

NOTES

- Year 2018 Recorded: Represents the allowances proceeds in 2018 through 9/30/18 and forecast proceeds based on remaining expected consigned allowances multiplied by the proxy price of vintage 2018 California Carbon Allowance Future.
- 2018 GHG Revenue Proceeds are being credited to customers in October 2018. The 2018 balance is assumed to be zero.

Table D: GHG Outreach and Administrative Expenses

Line	Description	2018		2019	
		Forecast	Recorded/ Forecast	Forecast	Recorded*
1	Outreach Expenses				
2	Detail of Outreach Activity (\$) (See Note 1)	\$ 187,303	\$ 40,453	\$ 73,000	
3	Subtotal Outreach (\$)	\$ 187,303	\$ 40,453	\$ 73,000	\$ -
4	Administrative Expenses				
5	General Program Management (See Note 2)	\$ 223,000	\$ 177,409	\$ 320,000	
6	IT/Billing System Enhancements (See Note 2a)	\$658,000	\$532,454	\$52,270	
7	Customer Inquiry Support Cost (See Note 2b)	\$ 84,000	\$ 81,130	\$ 130,000	
8	Subtotal Administrative (\$)	\$ 965,000	\$ 790,993	\$ 502,270	\$ -
9	Subtotal Outreach and Administrative (\$)*	\$ 1,152,303	\$ 831,446	\$ 575,270	\$ -
10	Interest (\$)		\$ 12,332		\$ -
11	Total (\$)	\$ 1,152,303	\$ 843,778	\$ 575,270	\$ -

* 2018 Recorded/Forecast expenses include actual expenses for January through September plus a forecast from October to December

Table E: Compliance Obligation Over Time

	2016	2017
Natural Gas Fuel Supplier Compliance Obligation (MTCO ₂ e)	17,251,614	NA
Company Facility Compliance Obligation (MTCO ₂ e)	253,236	NA

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November 1, 2018

Attachment 7

Confidentiality Declaration

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**PACIFIC GAS AND ELECTRIC COMPANY
ORDER INSTITUTING RULEMAKING TO ADDRESS NATURAL GAS
DISTRIBUTION UTILITY COST AND REVENUE ISSUES ASSOCIATED WITH
GREENHOUSE GAS EMISSIONS (R.14-03-003)**

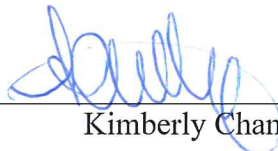
**DECLARATION OF KIMBERLY CHANG
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN ADVICE 4038-G**

I, Kimberly Chang, declare:

1. I am a Manager in the Portfolio Management group in the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing commercial greenhouse gas policy and compliance activities. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive procurement information.
2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, D.14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement data and information contained in Advice 4038-G.
3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive procurement data and information covered by Public Utilities Code Section 454.5(g) and D.14-10-033. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that

allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on October 30, 2018 at San Francisco, California.



Kimberly Chang

PACIFIC GAS AND ELECTRIC COMPANY (U 39 G)

ORDER INSTITUTING RULEMAKING TO ADDRESS NATURAL GAS DISTRIBUTION UTILITY COST AND REVENUE ISSUES ASSOCIATED WITH GREENHOUSE GAS EMISSIONS (R.14-03-003) PG&E ADVICE 4038-G

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
Document:			
<p>Atch 6 – Table A, lines 6-14 and 19-20 - recorded data</p> <p>Atch 6 – Table B, all data</p> <p>Atch 6 – Table C, lines 1-4, and 11-12 - recorded data</p> <p>Atch 6 – GHG Procurement Limits</p>	<p><i>Market Sensitive Information</i></p>	<p>Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E's customers and put PG&E at an unfair business advantage by the disclosure of PG&E's GHG compliance instrument inventories or quantities that can be used to derive GHG compliance instrument holdings. This information could be used by other market participants to gain a commercial advantage.</p>	<p>Indefinite</p>

EXHIBIT 3

PG&E Gas and Electric Advice Filing List General Order 96-B, Section IV

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	Ellison Schneider & Harris LLP	Praxair
Alcantar & Kahl LLP	Energy Management Service	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Charge Networks	SPURR
Braun Blaising Smith Wynne P.C.	Green Power Institute	San Francisco Water Power and Sewer
CalCom Solar	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	ICF	Sempra Utilities
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Keyes & Fox LLP	Sunshine Design
Cenergy Power	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity	Linde	TerraVerde Renewable Partners
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	Los Angeles Dept of Water & Power	TransCanada
Clean Power Research	MRW & Associates	Troutman Sanders LLP
Coast Economic Consulting	Manatt Phelps Phillips	Utility Cost Management
Commercial Energy	Marin Energy Authority	Utility Power Solutions
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Specialists
Crossborder Energy	Modesto Irrigation District	Verizon
Crown Road Energy, LLC	Morgan Stanley	Water and Energy Consulting
Davis Wright Tremaine LLP	NLine Energy, Inc.	Wellhead Electric Company
Day Carter Murphy	NRG Solar	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	Office of Ratepayer Advocates	Yep Energy
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	